



hispanicfederation

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October 2, 2006

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Robert McDowell
Commissioner Deborah Tate
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: FCC Docket #97-80

Dear Chairman Martin, Commissioners Copps, Adelstein, McDowell and Tate:

On behalf of the Hispanic Federation, I ask that the Federal Communications Commission grant a temporary waiver of the integration ban. This ban would hurt American consumers by placing an unjust tax on cable set-top boxes.

Established in 1990 by a group of Hispanic leaders, the Hispanic Federation is a membership organization of over 90 Latino organizations in Connecticut, New Jersey, New York, and Pennsylvania. Since its inception, the Hispanic Federation's mission has been to meet the growing needs of the Hispanic community.

The integration-ban would prevent cable companies from leasing set-top boxes with internal or "integrated" security functions -- which enable consumers to get access to the programming to which they subscribe -- and require the industry to instead deploy only those navigation devices that use external CableCARDs. The new boxes offer cable customers no additional functionality or other benefits, but would cost consumers an estimated \$600 million each year. In effect, this would amount to an FCC cable box tax on cable customers of \$2 to \$3 per month per box. By the droves, consumers have voted with their pocketbooks to reject these plug-and-play devices. That is why this effort by the FCC to hoist these devices on unwilling consumers is more than a bit puzzling.

Studies indicate that of the 40 million Hispanics in the United States, a large proportion rely on cable and broadcast television for news and entertainment. The proposed integration-ban which is supposed to take effect in July 2007 would represent a highly regressive and unjustified tax on these consumers.

Furthermore, we must do everything in our power to speed the transition to digital television. Yet, the FCC's integration ban would divert critical resources to the manufacture and deployment of CableCARD technology of yesterday, instead of encouraging companies to invest in new "downloadable" security that will speed the digital transition at much lower costs for tomorrow. This is especially important to Hispanic Americans because digital television provides greater access to niche and ethnic programming.

Therefore, the Hispanic Federation urges the FCC to grant the petition for waiver of the integration ban. The cost of the integration ban is too high for consumers and will unduly tax Hispanic and other Americans while giving us little in return.

Sincerely,

A handwritten signature in black ink, appearing to read "Lillian Rodriguez Lopez". The signature is fluid and cursive, with the first name "Lillian" being the most prominent part.

Lillian Rodriguez Lopez
President